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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(JOINTLY ADMINISTERED)

Affects Both Debtors

Affects PG&E Corporation

Affects Pacific Gas and Electric Company

**DECLARATION OF THOMAS G.
HOFFMAN, JR. IN SUPPORT OF
LEAD PLAINTIFF PERA AND THE
SECURITIES ACT PLAINTIFFS' (1)
OPPOSITION TO THE REORGANIZED
DEBTORS' OMNIBUS REQUEST FOR
INCORPORATION OF DOCUMENTS BY
REFERENCE OR JUDICIAL NOTICE
AND (2) CROSS-REQUEST FOR
JUDICIAL NOTICE**

United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Thomas G. Hoffman, Jr., declare as follows:

2 1. I am a member in good standing of the bar of the State of New York and I am
3 admitted *pro hac vice* to practice before this Court. I am a partner at Labaton Keller Sucharow LLP,
4 Counsel for the Lead Plaintiff Public Employees Retirement Association of New Mexico and Lead
5 Counsel for the Class. I have personal knowledge of facts set forth herein and if called to testify I
6 could and would do so competently.

7 2. I submit this declaration in support of Lead Plaintiff PERA and the Securities Act
8 Plaintiffs' (1) Opposition to the Reorganized Debtors' Omnibus Request for Incorporation of
9 Documents by Reference or Judicial Notice and (2) Cross-Request for Judicial Notice which are
10 being filed contemporaneously herewith. Plaintiff requests that Court take judicial notice of the
11 attached exhibits.

12 3. Annexed as exhibits are true and correct copies of the following:

13 1. California Public Utilities Commission, *Protest of The Utility Reform*
14 *Network*, filed May 4, 2018, available at
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M213/K824/213824387.PDF>;

15 2. California Public Utilities Commission, *Protest of the Office of Ratepayer*
16 *Advocates*, filed May 4, 2018, available at
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M213/K823/213823845.PDF>;

17 3. California Public Utilities Commission, *Motion of Pacific Gas and Electric*
18 *Company (U 39 E) For Reissuing Its 2018 CEMA Testimony and Work papers and Auditor*
19 *Selection Process*, dated July 1, 2019, available at
<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M309/K725/309725339.PDF>;

20 4. California Public Utilities Commission, *Assigned Commissioner's Revised*
21 *Ruling Granting Pacific Gas and Electric Company Motion to Facilitate the Hiring of an*
22 *Independent Auditor for Resolution ESRB-4 Purposes*, filed on Oct. 16, 2019, available at
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M317/K684/317684171.PDF>;

23 5. California Public Utilities Commission, *Decision Approving Settlement*,
24 dated March 17, 2022, available at
<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M461/K202/461202251.PDF>;

25 6. California Public Utilities Commission, *Application of Pacific Gas and*
26 *Electric Company (U 39 E)*, filed Oct. 31, 2016, available at
<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M169/K117/169117865.PDF>;

27 7. K&E Report, *United States of America v. Pacific Gas & Electric Company*,
28 No. 3:14-cr-00175, ECF No. 1089 (N.D. Cal. July 26, 2019);

1 8. Order, *United States of America v. Pacific Gas & Electric Company*, No.
2 3:14-cr-00175, ECF No. 1186 (N.D. Cal. April 29, 2020) (“Order Modifying Conditions of
Probation”) (Alsup, J.);

3 9. CPUC letter regarding Transmission Audit of PG&E’s Table Mountain
4 Division dated Oct. 23, 2019, available at https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpuc_public_website/content/safety/electric_safety_and_reliability/reports_and_audits/electric_facilities/ta2019-847-pge-tablemountaintransmissionauditreport.pdf;

6 10. ABC 10, “Secrets of the Camp Fire: 3 years later, exposing evidence of
PG&E’s crimes,” November 8, 2021;
<https://www.abc10.com/article/news/local/wildfire/camp-fire-evidence-of-pge-crimes/103-1a46d20d-9891-4043-a474-944a8b97d9f2>.

8 I hereby declare under penalty of perjury that the foregoing is true and correct.

9 Dated: March 15, 2024

10 /s/ Thomas G. Hoffman, Jr.
11 Thomas G. Hoffman, Jr.

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2 **EXHIBIT A**
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